

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

Plaintiff and Counter Defendant,

AND

**JOHN MICHEAL GRZAN AND
NAMRATA KHIMANI**

Counter Defendant,

V.

ALAN BRAM GOLDMAN;

Defendant and Counter Claimant.

Civil No. 3:20-cv-01747 (PAD)

**BREACH OF CONTRACT; SPECIFIC
PERFORMANCE OF CONTRACT;
REIMBURSEMENT OF FUNDS, COSTS
AND EXPENSES**

**ALAN BRAM GOLDMAN'S MOTION REQUESTING TIME TO FILE A REPLY TO
PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS**

TO THE HONORABLE COURT:

COMES NOW defendant Alan Bram Goldman (hereinafter, "Mr. Goldman") through the undersigned attorney, and respectfully states and prays the following:

1. On June 18, 2021, Mr. Goldman filed his Motion to Dismiss Teal Peak Capital, LLC's ("TPC") Amended Complaint. See Docket No. 63. Pursuant to this Honorable Court's Order, TPC had until July 6, 2021 to respond. See Docket No. 64.
2. On July 6, 2021, TPC requested an extension of time until July 14, 2021 to file an opposition to Mr. Goldman's Motion to Dismiss. See Docket No. 74. The Court granted TPC's motion. See Docket No. 75.

3. Mr. Goldman intends to respond to TPC's opposition to the Motion to Dismiss. As such, Mr. Goldman respectfully requests from this Honorable Court to allow him to reply to TPC's opposition on or before July 31, 2021.

WHEREFORE Alan Bram Goldman very respectfully requests that the Court grant the present Motion and allow him to reply to TPC's opposition to his Motion to Dismiss on or before July 31, 2021.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of July 2021.

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IT IS HEREBY CERTIFIED that on this date we filed a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice electronically to all counsel at their address of record.

Date: July 12, 2021

By: s/Antonio A. Arias-Larcada
Attorney